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February 29, 2008

VIA ECFS

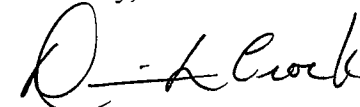
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: Annual Customer Proprietary Network Information Compliance
Certification; EB Docket No. 06-36

Dear Ms. Dortch:

Please find the attached Annual Customer Proprietary Network Information ("CPNI") Compliance Certification for Line Systems, Inc. Please feel free to call me if you have any questions regarding this filing.

Sincerely,



Devin L. Crock

Attachment

Annual Customer Proprietary Network Information Certification
Pursuant to 47 C.F.R. § 64.2009(e)
EB Docket No. 06-36
February 28, 2008

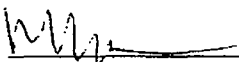
Name of Company: Line Systems, Inc.
Form 499 Filer ID: 821466
Name of Signatory: Mike Miller
Title of Signatory: CEO

I, Mike Miller, certify that I am an officer of Line Systems, Inc. ("LSI"), and acting as an agent of LSI, that I have personal knowledge that LSI has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how LSI's procedures ensure the company is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules.

LSI has not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year. LSI has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.*, through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

LSI has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Mike Miller
CEO
Line Systems, Inc.

Date: 2-28-08

Customer Proprietary Network Information Certification Attachment A

LSI has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules, as modified by the Commission in 2007.

Safeguarding against pretexting

- LSI takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. LSI is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

Training and discipline

- LSI trains its supervisory and non-supervisory personnel in an effort to ensure that its employees, in accordance with FCC regulations: (a) understand what CPNI is, (b) join in and carry-out LSI's obligation to protect CPNI, (c) understand when they are and when they are not authorized to use or disclose CPNI, (d) obtain customers' informed consent as required with respect to its use for marketing purposes, and (e) keep records regarding receipt of such consent, customer complaints regarding CPNI and the use of CPNI for marketing campaigns.
- LSI employees are required to review LSI's CPNI practices and procedures and to acknowledge their comprehension thereof.
- LSI also requires all outside Dealers and Agents to review LSI's CPNI practices and procedures and to acknowledge receipt and review thereof.
- LSI has a disciplinary process in place for violation of the company's CPNI practices and procedures. The careless or intentional failure to comply with these practices and procedures may result in disciplinary action, up to and including discharge.

LSI's use of CPNI

- LSI may use CPNI for the following purposes:
 - To initiate, render, maintain, repair, bill and collect for services;
 - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
 - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
 - To market additional services to customers that are within the same categories of service to which the customer already subscribes;
 - To provide CPE and call answering, voicemail or messaging, voice storage and retrieval services, fax store-and-forward, and protocol conversion;
 - To market services formerly known as adjunct-to-basic services; and

- LSI does not disclose or permit access to CPNI to track customers that call competing service providers.
- LSI discloses and permits access to CPNI where required by law (e.g., under a lawfully issued subpoena).
- LSI maintains CPNI no longer than necessary for its original purpose, except when required to maintain CPNI by law or for any legitimate business purpose.
- LSI does not market or otherwise sell CPNI to any third party.

Customer approval and informed consent

- LSI has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system also allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.
 - Prior to any solicitation for customer approval, LSI notifies customers of their right to restrict the use of, disclosure of, and access to their CPNI.
 - LSI uses opt-in approval when using or disclosing CPNI for purposes other than permitted under opt-out approval or in 47 USC 222 and the FCC's CPNI rules.
 - A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.
 - Records of approvals are maintained for at least one year.
 - LSI provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI.
 - The content of LSI's CPNI notices comply with FCC rule 64.2008(c).

Opt-out

- LSI uses opt-out for the marketing of communications related services by its employees outside the category of service to which the customer subscribes and for affiliate marketing of any communications related services. When LSI uses opt-out approval, LSI provides notification by electronic or written methods and waits at least 30 days after sending customers notice (for mail notifications, the 30 days begins to run 3 days after the notice was sent) and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. LSI provides customers with opt-out notifications every two years. When using e-mail for opt-out notices, LSI complies with the additional requirements set forth in FCC rule 64.2008(d)(3). Additionally, LSI makes available to every customer an opt-out method, at no additional charge, that is available 24 hours a day, seven days a week.

Opt-in

- LSI uses opt-in approval for marketing by independent contractors and joint venture partners and for then marketing of non-communications related services by itself and its affiliates. When LSI uses opt-in approval, LSI provides notification consistent with FCC rule 64.2008(c).

One time use

- After authentication, LSI uses oral notice to obtain limited, one-time approval for use of CPNI for the duration of a call. The contents of such notice comports with FCC rule 64.2008(f).

Additional safeguards

- LSI maintains for at least one year records of all marketing campaigns that use its customers' CPNI, including a description of each campaign and the CPNI used, the products offered as part of the campaign, and instances where CPNI was disclosed to third parties or where third parties were allowed access to CPNI. Such campaigns are subject to a supervisory approval and compliance review process, the records of which also are maintained for a minimum of one year.
- LSI has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules for outbound marketing situations and maintenance of records.
- LSI designates one or more officers, as an agent or agents of the company, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- LSI will provide written notice to the Commission in accordance with the requirements of FCC rule 64.2009(f) if ever its opt-out mechanisms malfunction in the manner described therein.
- For customer-initiated telephone inquiries regarding or requiring access to CPNI, LSI authenticates the customer (or its authorized representative), through a pre-established password, without prompting through the use of readily available biographical or account information. If the customer cannot provide a password, then LSI only discloses call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record.
- For online customer access to CPNI, LSI authenticates the customer (or its authorized representative) without the use of readily available biographical or account information. After the customer has been authenticated, LSI utilizes a customer-established password to authorize account access. LSI establishes passwords and has employed back-up authentication for lost or forgotten passwords consistent with the requirements of FCC rule 64.2010(e).
- LSI does not have any retail locations.
- LSI notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
- LSI may negotiate alternative authentication procedures for services that LSI provides to business customers that have both a dedicated account representative and a contract that specifically addresses LSI's protection of CPNI.
- In the event of a breach of CPNI, LSI will notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs LSI to delay notification, or LSI and the investigatory party agree to an earlier notification. LSI will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.
- When LSI discloses to or provides independent contractors or joint venture partners with access to CPNI, it does so pursuant to confidentiality agreements that (a) require the independent contractor/joint venture partner to use CPNI only for the purpose it has been provided, (b) prohibit

independent contractor/joint venture partners disclosure of such CPNI except under force of law, and (c) require the independent contractor/joint venture partner to have appropriate protections in place to ensure the ongoing confidentiality of the CPNI.